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6 Attorneys for Defendant

7 **IN THE UNITED STATES DISTRICT COURT**
8 **FOR THE DISTRICT OF ARIZONA**

9 James Oliver Romine Jr.,

10 No. 2:16-cv-00604-JJT

11 Plaintiff,

12 vs.

13 James Nicholas Stanton,

14 Defendant.
15
MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE
RESPOND TO THE COMPLAINT
(First Request)

16 Pursuant to LRCiv. 7.3, Defendant James Nicholas Stanton requests an extension of
17 time for Defendant to answer or otherwise respond to the Complaint. Defendant's current
18 response deadline is April 5, 2016. A 30-day extension is requested up to and including May
19 5, 2016. This is Defendant's first request.

20 Defendant is a resident of Mississippi and is still in the process of retaining Arizona
21 counsel. Counsel then requires time to review the complaint, evaluate the alleged libelous
22 statements supporting Plaintiff's 10-count complaint with exhibits requesting \$10,761,000 in
23 damages, and then confer with Defendant regarding an answer or other responsive pleading.

24 Today undersigned counsel tried to reach *pro se* Plaintiff James Oliver Romine Jr. by
25 telephone to determine Plaintiff's position on this motion, as required under LRCiv. 7.3(b). A
26 message was left on Plaintiff's voice mail regarding the motion and included a phone number
27 and email address for a response. As of the time of this filing Plaintiff has not received a
28 response. Given the approaching deadline undersigned counsel felt it was prudent to file this

1 motion without awaiting a response from Plaintiff so that an order could be entered before the
2 April 5th deadline.

3 A proposed form or order granting this request is submitted herewith.

4 RESPECTFULLY SUBMITTED this 1st day of April, 2016.

5 **HARTMAN TITUS PLC**

6 By: /s/Bradley P. Hartman

7 Bradley P. Hartman

8 John D. Titus

9 7114 E. Stetson Drive, Suite 205

10 Scottsdale, Arizona 85251-3250

Attorneys for Defendant

11 **CERTIFICATE OF SERVICE**

12 I hereby certify that on April 1, 2016, I caused the
13 foregoing document to be filed electronically with the
14 Clerk of Court through CM/ECF System for filing and
15 transmittal of Notice to the following CM/ECF registrant:

16 James Oliver Romine Jr.
17 12494 Ironwood Dr.
18 Yuma, AZ 85367
19 jromine2445@gmail.com
Plaintiff

20 /s/ Bradley P. Hartman